

HPNS Technical Team Meeting Agenda
August 7, 2018, 1000-1100 PT

1. Welcome and check-in

Navy BRAC – Steve Banister, ~~Pat Brooks~~, Danielle Janda, Derek Robinson, Thomas Macchiarella

Navy BRAC Consultants – Craig Bias, John Hackett, Scott Hay, Kim Henderson, Kathy Higley, Alex Lopez

RASO – Zach Edwards, ~~Matt Liscio~~, Matt Slack

EPA and consultants – Karla Brasaemle, ~~John Chesnut~~, Jana Dawson, Donna Getty, ~~David Kappelman~~, Jackie Lane, Lily Lee, ~~Lyndsey Nguyen~~

DTSC – Nina Bacey, ~~Janet Naito~~

CDPH – ~~Sheetal Singh~~, Matt Wright

City (includes OCII/SFDPH and consultants) – Amy Brownell, Bob Burns, Christina Rain

Water Board – Tina Low, ~~David Tanouye~~

2. Parcel G and background soil work planning

- Draft work plans submitted to regulators and public 6/15, comments due 8/14
 - i. Meeting 7/17 and follow-up call 7/26 to discuss technical comments – anticipating regulatory review comments by 8/14, in the meantime, based on the meetings
 - ii. we have been Working on the following to get a head start:
 1. Introduction section text to introduce/explain regulators proposal of 33% of TUs as Phase 1. Draft text was reviewed real-time. Nina was also potentially working on language to document that 100% excavation may be needed to include in DTSC comments, but she liked the draft language presented and will review and consider.
 2. Calculation and rationale for # of samples - for Parcel G, the number of samples (b) (5) will be calculated based on an assumed variability in background and will be recalculated after background data is collected. For the RBAs, the number of samples was increased to 25. Per previous comments, (b) (5) offsite subsurface soil and (b) (5) per onsite surface soil areas will be added.
 3. Building summary table to include the building, brief history (former use/source), list of SUs, rationale for why SUs selected (if available), rationale for if different than TtEC SUs, and reference to the associated figure.
 4. Also received recommendations from EPA on Phase 1 TUs to change out 4 TUs and the figure and tables are being updated.
 5. Amy questioned the next step per recent managers discussions on the path forward. Lily indicated that EPA is standing by their proposal and recommendation of 100% excavation if there is a failure and defining failure as the RG above background (unless due to NORM) in this work plan. CDPH agrees with 100% excavation. Nina indicated that there is a manager meeting scheduled for 8/13 for DTSC to review the comments and concerns prior to comment submittal. The Team discussed the

concerns with identifying failure criteria, differences in the interpretation of the ROD, the potential for conducting the work using the same approach and expecting different results because new background data will be collected, and differences in how EPA (not to exceed RGs above the average background concentration) and DTSC/CDPH (use of statistics) evaluate data. The Navy is concerned with cleaning up background and NORM and even with the proposed background study, if an average value is used for Cs-137, the Navy may still be cleaning up concentrations from fallout. The Team discussed how background data is applied at other sites, and EPA suggested that other sites have successfully used background ranges and 95% UCLs. The work plan is written to enable the team to collect the data as an investigation to facilitate path forward discussions with actual data. The Team expressed and acknowledged frustration for all parties and agreed that the path forward will be a management decision.

6. A draft final is planned for submittal. EPA requested public comments once received as they may have additional comments based on the public comments.

- Draft SAP planned for submittal to regulators in August – The SAP matches the current work plan approach and is currently with Navy QAO for review. Navy QAO comments will be received next week and the comments will be addressed, and the SAP submitted to the regulatory agencies this month. Changes based on the work plan will be incorporated following work plan comment resolution so if possible, regulators can refer to previous comments where appropriate.

3. Findings reports

- Pending Navy review of RTCs and draft final
 - i. Parcels B and G Soil
 - ii. Parcels D-2, UC-1, UC-2, and UC-3 Soil
- Pending EPA comments
 - i. Buildings
 - ii. Parcel C Soil
 - iii. Parcel E Soil

4. Future calls

- 8/21/18, 1000-1100 PT status call